



THE CITY OF NEW YORK
LAW DEPARTMENT

Hon. Sylvia Hinds-Radix
Corporation Counsel

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April 11, 2022

Via ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Carol Hasday v. City of N.Y. et al., 19-CV-10239 (LAP)

Your Honor:

I am the Assistant Corporation Counsel in the Office of Honorable Sylvia Hinds-Radix, Corporation Counsel of the City of New York, assigned to represent defendants City of New York and Sherry S. Chan in the above-referenced matter. The parties write jointly to respectfully request a settlement conference with Your Honor to facilitate a resolution of this case. Additionally, the parties request a stay of the deadline by which to file the discovery dispute letter, presently due tomorrow, and a stay of the depositions in this matter until sometime after a settlement conference is held.¹

As the Court is aware, the parties have been attempting to resolve this matter for the past couple of months. The parties are significantly close to resolving this matter but have reached an impasse. The parties believe that, given the helpfulness of the last settlement conference with Your Honor and the posture of the settlement negotiations thus far, another settlement conference can lead to a resolution of this matter without the further costs associated with continuing litigation and engaging in depositions.

As such, the parties respectfully request that the Court hold a settlement conference as soon as practicable. For scheduling purposes, as of this writing, the parties are available for said conference on April 25th, 26th, 28th or 29th and also available on the first and third weeks of May.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Maria Fernanda DeCastro
Assistant Corporation Counsel

¹ Depositions are currently scheduled for the week of April 25th.

4/11/22

Loretta A. Preska